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555 12th Street, N.W. Washington, D.C. 20004

voice 202.347.4964 fax 202.347.4961

EX PARTE OR LATE FILED

January 18, 2000

Ms. Magalie Roman Salas Secretary Federal Communications Commission 445 12th Street, SW Washington, D.C. 20554

John E. Logar

Ex Parte Submission Re: CC Dockets No. 99-200, 96-98 Number Resource Optimization

Dear Ms. Salas:

Enclosed for filing is an ex parte submission relating to the above dockets to the Deputy Chief of the Common Carrier Bureau and the Chief and Deputy Chief of the Network Services Division that was presented today. The necessary copies for both dockets are enclosed.

> Ohn G. hoy un John E. Logan

Copy provided to: Mr. Yog Varma, Deputy Chief, Common Carrier Bureau

Mr. L. Charles Keller, Chief, Network Services Division

Ms. Diane Griffin Harmon, Deputy Chief, Network Services Division

enclosure

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Sincerely,

John E. Logan

Copy provided to: Mr. Yog Varma, Deputy Chief, Common Carrier Bureau

Mr. L. Charles Keller, Chief, Network Services Division

Ms. Diane Griffin Harmon, Deputy Chief, Network Services Division

enclosure



January 18, 2000

Mr. Yog Varma
Deputy Chief
Common Carrier Bureau
Federal Communications Commission
Washington, D.C. 20554

RE: CC Docket No. 99-200, 96-98 Number Resource Optimization

Dear Mr. Varma:

Thank you for your time, as well as that of Mr. Keller and Ms. Harmon, on January 14, 2000. We appreciate very much the opportunity to provide an update on MediaOne's severe telephone number shortage in three states where it offers facilities-based local residential telephone service — California, Massachusetts and New Hampshire. During the presentation, you raised three questions; this letter responds to those questions.

First, has the California Public Utilities Commission (CPUC) seen NeuStar's 1/3/00 forecast for the 310 NPA? Yes, the CPUC has a copy of the report. Members of the CPUC's staff were in attendance when NeuStar presented its report to the telecommunications industry. This report demonstrates that, even with thousands-block number pooling, area code relief is needed in the 310 NPA. Number administration in the 310 NPA is too far exhausted. Carriers are forecasting the need for more codes than will be donated. We continue to believe sincerely that the failure to provide area code relief in the 310 NPA effectively embraces number conservation as a priority over the rollout of competitive services.

Second, has the CPUC adopted rules for the receipt of donated blocks? No, at present, the CPUC has not yet adopted any such rules. Carriers must follow the INC Guidelines, which require that telephone numbers be used within six months of receipt. If a carrier does not use the numbers within that time period, then NeuStar is to reclaim them. Carriers have not been asked to "pledge" that they will use the donated blocks within six months. However, the CPUC can monitor the use of the numbers through carriers' quarterly reports.

Third, how quickly does MediaOne anticipate that it will use up its thousands blocks? That is, how quickly does MediaOne expect that it will need additional thousands-blocks? For the last six months, MediaOne has been unable to offer local

residential telephone service in four Los Angeles communities because it does not have any telephone numbers in the appropriate rate centers. In these communities, MediaOne's telephony-ready network passes 44,000 homes. MediaOne's anticipated demand for additional thousands-blocks varies by community. Assuming that pooling is implemented by March, MediaOne anticipates that, in at least one of the communities, it will need a second thousands-block within months of this allocation. In two other communities, MediaOne believes that it will need additional blocks by the end of the year. In sum, getting one thousands-block per rate center will not be sufficient to meet MediaOne's demand in 2000.

Again, on behalf of MediaOne, we appreciate very much the time that you and the Network Services Division have afforded our views. If you have any additional questions, please do not hesitate to contact us.

A copy of this letter will be filed with the Commission's Secretary.

Respectfully,

Tina S. Pyle

Executive Director-Public Policy

MediaOne Group

188 Inverness Drive West

Tina S. Kyle,

Englewood, Colorado 80112

303. 858.3529

Richard A. Kane

Senior Attorney MediaOne Group

188 Inverness Drive West

Englewood, Colorado 80112

303.858.3504

Copies Provided To:

Mr. L. Charles Keller, Chief, Network Services Division

Ms. Diane Griffin Harmon, Deputy Chief, Network Services Division